

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION

UNITED STATES OF AMERICA,	)	No. <u>02-00116-03-CR-W-FJG</u>
	)	
Plaintiff,	)	COUNT ONE: (Conspiracy)
	)	21 U.S.C. § 846
v.	)	NLT 10 Years; NMT Life
	)	Imprisonment
STEVE L. WRIGHT, JR.,	)	NMT/NLT 5 Years Supervised
a/k/a "MOODY,"	)	Release
a/k/a "RONALD F. WHITE,"	)	\$4,000,000 Fine
[DOB: 06/10/83]	)	Class A Felony
	)	
Defendant.	)	COUNT TWO: (PWITD Marijuana)
	)	21 U.S.C. §§ 841(a)(1) and
	)	(b)(1)(D); and 18 U.S.C. § 2
	)	NMT 5 Years Imprisonment
	)	1 Year Supervised Release
	)	\$250,000 Fine
	)	Class D Felony
	)	
	)	COUNT THREE: (PWITD More than
	)	500 grams of Cocaine)
	)	21 U.S.C. §§ 841(a)(1) and
	)	(b)(1)(B)(ii), 846; and
	)	18 U.S.C. § 2
	)	NLT 5 Years; NMT 40 Years
	)	Imprisonment
	)	NMT/NLT 4 Years Supervised
	)	Release
	)	\$2,000,000 Fine
	)	Class B Felony
	)	
	)	COUNT FOUR: (Murder)
	)	18 U.S.C. §§ 924(c)(1)(A) and
	)	924(i)(1)
	)	NMT Life Imprisonment
	)	NMT 5 Years Supervised
	)	Release
	)	\$250,000 Fine
	)	Class A Felony
	)	
	)	COUNT FIVE: (Attempt PWITD
	)	PCP)
	)	21 U.S.C. §§ 841(a)(1),
	)	841(b)(1)(B)(iv), 846; and
	)	18 U.S.C. § 2

) NLT 5 Years; NMT 40 Years  
 ) Imprisonment  
 ) NMT/NLT 4 Years Supervised  
 ) Release  
 ) \$2,000,000 Fine  
 ) Class B Felony  
 )  
 ) COUNT SIX: (Use of Firearm in  
 ) Drug-Trafficking Offense)  
 ) 18 U.S.C. §§ 924(C) (1) (A) (iii)  
 ) and 2;  
 ) Mandatory 10 Years  
 ) Imprisonment (Consecutive);  
 ) NMT 3 Years Supervised Release  
 ) \$250,000 Fine  
 ) Class C Felony  
 )  
 ) COUNT SEVEN: (Murder)  
 ) 18 U.S.C. §§ 1512(a) (1) (C)  
 ) and 2  
 ) NLT Life Imprisonment  
 ) NMT 5 Years Supervised Release  
 ) \$250,000 Fine  
 ) Class A Felony  
 )  
 ) COUNT EIGHT: (PWITD  
 ) Methamphetamine)  
 ) 21 U.S.C. §§ 841(a) (1) and  
 ) 841(b) (1) (C)  
 ) NMT 20 Years Imprisonment  
 ) 3 Years Supervised Release  
 ) \$250,000 Fine  
 ) Class C Felony  
 )  
 ) COUNT NINE: (Use of Firearm in  
 ) Drug-Trafficking Offense)  
 ) 18 U.S.C. §§ 924(C) (1) (A) (iii)  
 ) and 2;  
 ) Mandatory 10 Years  
 ) Imprisonment (Consecutive)  
 ) NMT 3 Years Supervised Release  
 ) \$250,000 Fine  
 ) Class C Felony  
 )  
 ) COUNT TEN: (PWITD Marijuana)  
 ) 21 U.S.C. §§ 841(a) (1) and  
 ) 841(b) (1) (D); and 18 U.S.C.  
 ) § 2

) NMT 5 Years Imprisonment  
 ) 1 Year Supervised Release  
 ) \$250,000 Fine  
 ) Class D Felony  
 )  
 ) COUNT ELEVEN (Murder)  
 ) 18 U.S.C. §§ 924(c) (1) (A) and  
 ) 924(i) (1)  
 ) NMT Life Imprisonment  
 ) NMT 5 Years Supervised Release  
 ) \$250,000 Fine  
 ) Class A Felony  
 )  
 ) COUNT TWELVE: (PWITD Cocaine  
 ) Base)  
 ) 21 U.S.C. §§ 841(a) (1),  
 ) 841(b) (1) (B) (iii); and  
 ) 18 U.S.C. § 2  
 ) NLT 5 Years; NMT 40 Years  
 ) Imprisonment  
 ) NMT/NLT 4 Years Supervised  
 ) Release  
 ) \$2,000,000 Fine  
 ) Class B Felony  
 )  
 ) COUNT THIRTEEN: (PWITD  
 ) Marijuana)  
 ) 21 U.S.C. §§ 841(a) (1) and  
 ) 841(b) (1) (D); and 18 U.S.C.  
 ) § 2  
 ) NMT 5 Years Imprisonment  
 ) 1 Year Supervised Release  
 ) \$250,000 Fine  
 ) Class D Felony  
 )  
 ) COUNT FOURTEEN: (PWITD  
 ) Ecstasy)  
 ) 21 U.S.C. §§ 841(a) (1) and  
 ) 841(b) (1) (C); and 18 U.S.C.  
 ) § 2  
 ) NMT 20 Years  
 ) 3 Years Supervised Release  
 ) \$250,000 Fine  
 ) Class C Felony  
 ) COUNT FIFTEEN: (Possession of  
 ) Firearms During Drug  
 ) Trafficking Offense)  
 ) 18 U.S.C. § 924(c) (1) (A) (i);

) 18 U.S.C. § 2  
) Mandatory 5 Years Imprisonment  
) (Consecutive)  
) NMT 3 Years Supervised Release  
) \$250,000 Fine  
) Class C Felony  
)  
) COUNT SIXTEEN: (Distribution  
) of More than 50 grams of  
) Cocaine Base)  
) 21 U.S.C. §§ 841(a)(1), and  
) 841(b)(1)(A)(iii)  
) NLT 10 Years; NMT Life  
) Imprisonment  
) NMT/NLT 5 Years Supervised  
) Release  
) \$4,000,000 Fine  
) Class A Felony  
)  
) COUNT SEVENTEEN:  
) (Forfeiture of Currency)  
) 21 U.S.C. § 853  
)  
) \$100 Mandatory Special  
) Assessment (Counts One  
) Through Sixteen Only)

S E C O N D   S U P E R S E D I N G   I N D I C T M E N T

THE GRAND JURY CHARGES THAT:

COUNT ONE

Between on or about January 1, 1997, and October 8, 2003,  
the exact dates being unknown to the Grand Jury, in Jackson  
County, in the Western District of Missouri, and elsewhere,  
STEVE L. WRIGHT, JR., a/k/a MOODY, a/k/a RONALD F. WHITE,  
defendant herein, did knowingly conspire, confederate, and agree  
with Jamal T. Norris, Rashawn Long, William Williams, Charvez  
Williams, Javon Tyson, Terrence Diamond, Chatha Tatum, Shawn C.

Tuberville, James E. Mitchell, Vincent Sexton, and John B. Roberts, co-conspirators not indicted herein, and with others both known and unknown to the Grand Jury, to distribute more than fifty grams of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance; some amount of 3,4 methylenedioxy-methamphetamine (MDMA), also known as "ecstasy", a Schedule I controlled substance,; and some amount of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance; and other controlled substances, including phencyclidine (PCP) and diazepam (Valium) in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(iii), 841(b)(1)(C), and 841(b)(1)(D);

All in violation of Title 21, United States Code, Section 846.

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Manner and Means

(1) During the conspiracy, the co-conspirators, operating as a street gang known as the "51<sup>st</sup> Street Crips", repeatedly obtained controlled substances from various sources for resale, and also obtained and possessed firearms and other weapons in order to protect their drug supplies and the proceeds of their drug sales. These weapons were used by the defendant and his co-conspirators in "turf wars" with rival groups over areas in which drugs were illegally sold. Firearms were also used in armed

robberies of other drug dealers in order to steal their supplies of illegal drugs, which were then sold by the conspirators.

(2) The defendant and his co-conspirators often stole or otherwise procured stolen vehicles in furtherance of the charged conspiracy, both for purposes of transportation and to avoid identification and detection while involved in criminal activities.

(3) Defendant STEVE L. WRIGHT, JR., a/k/a MOODY, a/k/a RONALD F. WHITE, often obtained illegal drugs and gave them to defendant Norris and others, including John B. Roberts, to sell for him.

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Overt Acts

The following overt acts, among others, were committed by the defendant in furtherance of the conspiracy:

(1) All subsequent counts of this Indictment are hereby incorporated by reference herein as overt acts committed in furtherance of this conspiracy.

(2) On or about July 17, 1999, defendant STEVE L. WRIGHT, JR., a/k/a MOODY, a/k/a RONALD F. WHITE, and Javon Tyson possessed, with intent to distribute, an amount of cocaine base ("crack"), an amount of marijuana, and an amount of phencyclidine (PCP), as well as a loaded handgun.

(3) On or about January 21, 2000, defendant STEVE L. WRIGHT, JR., a/k/a MOODY, a/k/a RONALD F. WHITE, and Rashawn Long

possessed, with intent to distribute, an amount of cocaine base ("crack"), an amount of marijuana, a firearm, and a stolen automobile.

(4) On or about January 27, 2000, defendant STEVE L. WRIGHT, JR., a/k/a MOODY, a/k/a RONALD F. WHITE, and Rashawn Long possessed, with intent to distribute, an amount of marijuana. Wright was also found to be in possession of \$1,977.00 in cash.

(5) On or about February 9, 2000, defendant STEVE L. WRIGHT, JR., a/k/a MOODY, a/k/a RONALD F. WHITE, and Vincent Sexton possessed an amount of marijuana and an amount of diazepam (Valium), as well as handguns.

(6) On or about February 13, 2000, defendant STEVE L. WRIGHT, JR., a/k/a MOODY, a/k/a RONALD F. WHITE, possessed an amount of marijuana, \$2,158 in cash, and a stolen automobile.

(7) On or about March 1, 2000, defendant STEVE L. WRIGHT, JR., a/k/a MOODY, a/k/a RONALD F. WHITE, with Jamal T. Norris, possessed cocaine and cocaine base ("crack"), a loaded handgun, and a large quantity of cash.

(8) On or about June 13, 2000, defendant STEVE L. WRIGHT, JR., a/k/a MOODY, a/k/a RONALD F. WHITE, and other persons, used firearms to shoot at Alex Clark and Roland Jordan at the intersection of 33<sup>rd</sup> and Chestnut in Kansas City, Missouri.

(9) On or about July 13, 2000, defendant STEVE L. WRIGHT, JR., a/k/a MOODY, a/k/a RONALD F. WHITE, possessed firearms and a quantity of ammunition.

(10) On or about July 18, 2000, defendant STEVE L. WRIGHT, JR., a/k/a MOODY, a/k/a RONALD F. WHITE, shot and wounded Thomas Simmons, an associate of a rival street gang.

(11) On or about July 29, 2000, defendant STEVE L. WRIGHT, JR., a/k/a MOODY, a/k/a RONALD F. WHITE, possessed keys to a stolen automobile. This automobile contained a firearm which had been used in the shooting of Thomas Simmons on July 18, 2000.

(12) On or about January 10, 2001, defendant STEVE L. WRIGHT, JR., a/k/a MOODY, a/k/a RONALD F. WHITE, possessed a quantity of marijuana.

(13) On or about January 17, 2001, defendant STEVE L. WRIGHT, JR., a/k/a MOODY, a/k/a RONALD F. WHITE, possessed marijuana, \$3,675 in cash, the proceeds of illegal drug sales, and a butcher knife.

(14) On March 5, 2001, Rashawn Long, a co-conspirator not indicted herein, and defendant STEVE L. WRIGHT, JR., a/k/a MOODY, a/k/a RONALD F. WHITE, saw Marlon Brown at a Kansas City area nightclub. In an effort to silence Brown as a potential witness against them in the shootings of Anthony Conaway, Justin Hill,



and in the murder of Michael Birks, Long shot at and wounded Brown and two companions.

(15) On or about April 8, 2001, defendant STEVE L. WRIGHT, JR., a/k/a MOODY, a/k/a RONALD F. WHITE shot and wounded Kyle Williams near the Loma Vista Bowling Alley, located at 8756 Blue Ridge, Kansas City, Missouri.

(16) On April 17, 2001, Jamal T. Norris, a co-conspirator not indicted herein, carried a firearm, that is, a Glock, semi-automatic, 9mm pistol, serial number DM192.

(17) On May 29, 2001, defendant STEVE L. WRIGHT, JR., a/k/a MOODY, a/k/a RONALD F. WHITE, operated a stolen vehicle, and intentionally struck a police officer with that vehicle in order to avoid arrest.

(18) On July 1, 2001, Jamal T. Norris and Shawn Tuberville, co-conspirators not indicted herein, possessed cocaine base ("crack") with intent to distribute, and also possessed firearms.

(19) On April 8, 2002, Jamal T. Norris, a co-conspirator not indicted herein, distributed an amount of cocaine base ("crack") to an undercover police officer.

(20) On April 9, 2002, Jamal T. Norris, a co-conspirator not indicted herein, distributed an amount of cocaine base ("crack") to an undercover police officer.

(21) On April 11, 2002, Jamal T. Norris, a co-conspirator not indicted herein, distributed an amount of cocaine base ("crack") to an undercover police officer.

(22) On April 15, 2002, Jamal T. Norris and Shawn Tuberville, co-conspirators not indicted herein, distributed an amount of cocaine base ("crack") to an undercover police officer.

(23) On April 24, 2002, Jamal T. Norris and Shawn Tuberville, co-conspirators not indicted herein, possessed, with intent to distribute, an amount of cocaine base ("crack").

(24) On April 24, 2002, Jamal T. Norris and Shawn Tuberville, co-conspirators not indicted herein, possessed firearms, that is a 9mm Ruger handgun, serial number 313-22515, a 9mm Ruger handgun, serial number 310-07796, and 7.62 Norinco Brand 90 Sportster Assault Rifle.

(25) On April 24, 2002, Jamal T. Norris and Shawn Tuberville, co-conspirators not indicted herein, possessed, with intent to distribute, an amount of marijuana.

#### COUNT TWO

On or about March 1, 2000, in Jackson County, in the Western District of Missouri, STEVE L. WRIGHT, JR., a/k/a MOODY, a/k/a RONALD F. WHITE, defendant herein, and Jamal T. Norris, a co-conspirator not indicted in this Count, aiding and abetting each other, did knowingly and intentionally possess, with intent to distribute, some amount of a mixture and substance containing a

detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a) (1) and 841(b) (1) (D), and Title 18, United States Code, Section 2.

#### COUNT THREE

On or about June 14, 2000, in Jackson County, in the Western District of Missouri, STEVE L. WRIGHT, JR., a/k/a MOODY, a/k/a RONALD F. WHITE, defendant herein, did knowingly and intentionally attempt to possess, with the intent to distribute, more than five-hundred grams of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a) (1), 841(b) (1) (B) (ii) and 846.

#### COUNT FOUR

On or about June 14, 2000, in Jackson County, in the Western District of Missouri, STEVE L. WRIGHT, JR., a/k/a MOODY, a/k/a RONALD F. WHITE, defendant herein, did, knowingly and intentionally, during and in relation to a drug-trafficking crime, to wit: the attempted possession of cocaine with intent to distribute as alleged in Count Three, use a firearm, by shooting at and thereby causing the death of Hector Santos, in violation of Title 18, United States Code, Sections 924(c) (1) (A) and 924(i) (1) (codified at the time of the offense as 924(j) (1)).

#### COUNT FIVE

\_\_\_\_\_ On or about February 1, 2001, in Jackson County, in the Western District of Missouri, STEVE L. WRIGHT, JR., a/k/a MOODY, a/k/a RONALD F. WHITE, defendant herein, aiding and abetting William Williams and Rashawn Long, did knowingly and intentionally attempt to possess, with the intent to distribute, more than one-hundred grams of a mixture and substance containing a detectable amount of phencyclidine (PCP), a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(iv), 846 and Title 18, United States Code, Section 2.

COUNT SIX

On or about February 1, 2001, in Jackson County, in the Western District of Missouri, STEVE L. WRIGHT, JR., a/k/a MOODY, a/k/a RONALD F. WHITE, defendant herein, did, during and in relation to a drug-trafficking crime, to wit: the attempted possession of phencyclidine (PCP) with intent to distribute as alleged in Count Five, aiding and abetting William Williams and Rashawn Long, knowingly and intentionally use and discharge firearms, by shooting at and wounding Anthony Conaway and Justin Hill, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(iii) and 2.

COUNT SEVEN

On or about February 1, 2001, in Jackson County, in the Western District of Missouri, STEVE L. WRIGHT, JR., a/k/a MOODY, a/k/a RONALD F. WHITE, defendant herein, did, aiding and abetting William Williams and Rashawn Long, knowingly and intentionally kill Michael Birks, with intent to prevent the communication by Michael Birks to a law enforcement officer or judge of the United States of information relating to the commission of federal offenses, to wit: the attempted possession of phencyclidine (PCP) with intent to distribute as alleged in Count Five, and the shootings of Anthony Conaway and Justin Hill as alleged in Count Six, in violation of Title 18, United States Code, Sections 1512(a)(1)(C) and 2.

COUNT EIGHT

On or about April 2, 2001, in Jackson County, in the Western District of Missouri, STEVE L. WRIGHT, JR., a/k/a MOODY, a/k/a RONALD F. WHITE, defendant herein, did knowingly and intentionally possess, with intent to distribute, some amount of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT NINE

On or about April 2, 2001, in Jackson County, in the Western District of Missouri, STEVE L. WRIGHT, JR., a/k/a MOODY, a/k/a RONALD F. WHITE, defendant herein, did, during and in relation to a drug-trafficking crime, to wit: the possession of methamphetamine with intent to distribute as alleged in Count Eight, knowingly and intentionally use and discharge a firearm, by shooting at and wounding Reymundo Gonzalez, in violation of Title 18, United States Code, Section 924(c)(1)(A)(iii).

COUNT TEN

      On or about April 17, 2001, in Jackson County, in the Western District of Missouri, STEVE L. WRIGHT, JR., a/k/a MOODY, a/k/a RONALD F. WHITE, defendant herein, with Jamal T. Norris, a co-conspirator not indicted in this count, aiding and abetting each other, did knowingly and intentionally possess, with intent to distribute, some amount of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D), and Title 18, United States Code, Section 2.

COUNT ELEVEN

On or about June 29, 2001, in Jackson County, in the Western District of Missouri, STEVE L. WRIGHT, JR., a/k/a MOODY, a/k/a RONALD F. WHITE, defendant herein, did knowingly and intentionally, during and in relation to a drug-trafficking

crime, to wit: conspiracy to distribute controlled substances alleged in Count One, use a firearm, by shooting at and thereby causing the death of Alex Clark, in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 924(i)(1) (codified at the time of the offense as 924(j)(1)).\_\_\_\_\_

#### COUNT TWELVE

On or about October 3, 2001, in Jackson County, in the Western District of Missouri, STEVE L. WRIGHT, JR., a/k/a MOODY, a/k/a RONALD F. WHITE, defendant herein, with Jamal T. Norris, Shawn C. Tuberville and James E. Mitchell, co-conspirators not indicted herein, aiding and abetting each other, did knowingly and intentionally possess, with intent to distribute, more than five grams of a mixture and substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(iii), and Title 18, United States Code, Section 2.

#### COUNT THIRTEEN

On or about October 3, 2001, in Jackson County, in the Western District of Missouri, STEVE L. WRIGHT, JR., a/k/a MOODY, a/k/a RONALD F. WHITE, defendant herein, with Jamal T. Norris, Shawn C. Tuberville and James E. Mitchell, co-conspirators not indicted herein, aiding and abetting each other, did knowingly and intentionally possess, with intent to distribute, some amount

of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a) (1) and 841(b) (1) (D), and Title 18, United States Code, Section 2.

COUNT FOURTEEN

On or about October 3, 2001, in Jackson County, in the Western District of Missouri, STEVE L. WRIGHT, JR., a/k/a MOODY, a/k/a RONALD F. WHITE, defendant herein, with Jamal T. Norris, Shawn C. Tuberville and James E. Mitchell, co-conspirators not indicted herein, aiding and abetting each other, did knowingly and intentionally possess, with intent to distribute, some amount of a mixture and substance containing a detectable amount of 3,4 methylenedioxy- methamphetamine (MDMA), also known as "ecstasy", a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a) (1) and 841(b) (1) (C), and Title 18, United States Code, Section 2.

COUNT FIFTEEN

On or about October 3, 2001, in Jackson County, in the Western District of Missouri, STEVE L. WRIGHT, JR., a/k/a MOODY, a/k/a RONALD F. WHITE, defendant herein, with Jamal T. Norris, Shawn C. Tuberville and James E. Mitchell, co-conspirators not indicted herein, aiding and abetting each other, and in furtherance of drug-trafficking crimes, to wit: the possession of cocaine base with intent to distribute as alleged in Count



Twelve, the possession of marijuana with intent to distribute as alleged in Count Thirteen, and the possession of 3,4 methylenedioxy-methamphetamine (MDMA) (also known as "ecstasy") with intent to distribute as alleged in Count Fourteen, did knowingly and intentionally possess firearms, in violation of Title 18, United States Code, Sections 924(c) (1) (A) (i) and 2.

COUNT SIXTEEN

On or about November 19, 2002, in Jackson County, in the Western District of Missouri, STEVE L. WRIGHT, JR., a/k/a MOODY, a/k/a RONALD F. WHITE, defendant herein, did knowingly and intentionally distribute to John B. Roberts, a co-conspirator not indicted herein, more than 50 grams of a mixture and substance containing a detectable of cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a) (1) and 841(b) (1) (A) (iii).

COUNT SEVENTEEN

As a result of the offense charged in Count One of this Indictment, which is incorporated herein by reference, defendant STEVE L. WRIGHT, JR., a/k/a MOODY, a/k/a RONALD F. WHITE, shall forfeit to the United States any and all property constituting or derived from any proceeds the said defendant and his co-conspirators obtained directly or indirectly as a result of said violations and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission

of the violations alleged in Count One of this Indictment,  
including but not limited to the following:

- A. Approximately \$23,350 in U.S. Currency recovered on April 24, 2002, from the residence located at 3236 Garfield, Kansas City, Jackson County, Missouri.
- B. Approximately \$10,000 seized from defendant STEVE L. WRIGHT, JR., on October 8, 2003, at 11210 South Oak Street, Kansas City, Missouri.

All in violation of Title 21, United States Code, Section  
853.

A TRUE BILL:

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FOREPERSON OF THE GRAND JURY

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Charles E. Ambrose, Jr.  
Assistant United States Attorney

Dated: \_\_\_\_\_  
Kansas City, Missouri